

Enter the Case Number given by the Clerk:

19-cv-06332

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC, a Florida limited liability company,

Plaintiff,

v.

Case No. 19-cv-06332

CENTAUR CONSTRUCTION COMPANY INC., an Illinois
corporation, SPIRO TSAPARAS, and PETER ALEXOPOULOS,

Honorable Matthew F. Kennelly

Defendants.

ANSWER TO THIRD PARTY CITATION TO DISCOVER ASSETS

To creditor: fill out section 1. In 1a, enter the bank's name.

In 1b, enter the bank's current address.

In 1c, enter the debtor's name.

In 1d, enter the last 4 digits of the debtor's Social Security Number.

In 1e, list the amount of the judgment.

1. Information about the Respondent and the Debtor:

a. Respondent's name: Venmo LLC c/o National Registered Agents Inc., Registered Agent,

b. Respondent's address: 208 S. LaSalle Street, Suite 814

Street Address

Chicago, IL 60604

City

State

ZIP

c. Debtor's name: Centaur Construction Company, Inc.

A judgment was entered against the Debtor (amongst others) on March 15, 2023 in an aggregate original principal amount of no less than \$22,272,124.34, plus post-judgment interest at the statutory rate. A true and correct copy of the referenced judgment is enclosed herewith. The current amount that remains to be paid, including the Creditor's court costs and post judgment interest, minus any applicable payments which have been made, is no less than \$21,000,000.00 as of March 25, 2024, plus court costs of this proceeding.

NOTICE TO RESPONDENT: This is a *Citation*. You might need to freeze up to double the on the source of the deposits. See question 2.

To creditor: leave the rest of the form blank.

To Respondent: fill out the remaining parts of this form and sign it. Then file this *Answer* with the court and send a copy to the creditor. Contact the Clerk for instructions on how to file this *Answer* with the court.

2. Interrogatories:

a. On the date of service of the *Citation*, do you have any personal property or money belonging to the debtor?

☐ Yes ☒ No ***If no, do not fill out the rest of the form. Sign below.***

b. Is any of the money deposited into an IRA?

☐ Yes. If yes, do not freeze the IRA accounts. ☐ No

c. Have all of the deposits made during the past 90 days been electronically deposited and identified as Social Security, Unemployment Compensation, Public Assistance, Veteran's Benefits, Pension, or Retirement?

☐ Yes. If yes, do not freeze the account. ☒ No

d. Is the account's current balance equal to or less than the total of the exempt deposits? ☐ Yes. If yes, do not freeze the account. ☒ No

If you checked **No** in b, c, and d, then freeze up to double the amount of the judgment.

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	Account Type	Account Balance	Amount Withheld
1.		\$	\$
2.		\$	\$
3.		\$	\$
4.		\$	\$
5.		\$	\$
6.		\$	\$

b. ☐ Safety Deposit ☐ Yes ☐ Noc. ☐ Other property (rents, mortgages, etc.)

	Describe Property	Value of Property	Amount Withheld
1.		\$	\$
2.		\$	\$

d. ☐ Less Right of Offset for Loans \$e. **Total Amount Frozen:** \$**4. List all electronic monthly deposits:**

	Account Number	Source of Deposit	Monthly Amount
1.			\$
2.			\$
3.			\$

5. List all joint account holders or anyone who has a claim on the property:

If all of the property belongs to another person who is not the debtor, do not freeze the property.

a. First Middle Last NameStreetCityStateZIPAccount Information: Type: ☐ Checking ☐ CD ☐ Savings

Account Number: _____

b. First Middle Last NameStreetCityStateZIPAccount Information: Type: ☐ Checking ☐ CD ☐ Savings

Account Number: _____

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C.

FirstMiddleLast NameStreetCityStateZIPAccount Information: Type: ☐ Checking ☐ CD ☐ Savings

Account Number: _____

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete address, telephone number, and email address, if you have one.

Mail or hand-deliver a copy of this completed *Answer* to the Clerk, plaintiff, and debtor.

I certify that everything in the *Answer to Citation Proceeding* is true and correct. I understand that making a false statement on this form is perjury and has penalties by law under 735 ILCS 5/1-109.

Your SignaturePO Box 45950Street AddressBrooke CaldwellPrint Your NameOmaha, NE 68145City, State, ZIPEEOmaLegalSpecialist@paypal.comEmailEEOmaLegalSpecialist@paypal.comTelephoneAttorney # (if any)

GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 22, 2024, a true and correct copy of ***Venmo's Amended Answer to Third Party Citation*** was filed using the Court's CM/ECF e-filing system, which will send notification of such filing to all counsel registered to receive such notification, including the following counsel of record:

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